

EXHIBIT A
DOCUMENT REQUESTS

DEFINITIONS

1. “You” or “Your” means Matthew Romanoski.
2. “Unicorn” means Unicorn Partners, LLC.
3. “Nevels” means James Nevels.
4. “Estey” means John Estey.
5. “TSG” means The Swarthmore Group.
6. “Livingston” means Livingston Capital.
7. “AHCIF” means the Affordable Housing Community Investment Fund LP that The Swarthmore Group and Livingstone Partners collaborated on that allegedly never launched.
8. “Communication” means any transfer or exchange between two or more persons of any information whether by written, electronic or oral means, including, but not limited to, personal conversations, correspondence, telephone calls, emails, facsimiles, text messages, direct messages and social media direct messages. The definition includes all Communications for which Defendants claim a privilege applies. Defendants shall provide a privilege log identifying all such Communications.
9. “Documents” means the full scope of documents and things, including electronically stored information that may be required to be produced pursuant to the Pennsylvania Rules of Civil Procedure. It includes any document in the possession, custody, or control of any Defendant or their counsel and is used in its customary and broad sense to include the following items, whether printed, recorded, microfilmed, or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged, confidential, or personal:

- a. writings, files, computer or electronically-stored files, contracts, notes, telegrams, records, schedules, letters, memoranda, reports, agreements, working papers, manuals, standard or non-standard forms, recorded or taped interviews, or statements, communications (including intra-office communications, inter-office communications, and inter-company or inter-agency communications);
- b. correspondence, electronic mail (“e-mail”), summaries or records or personal conversations, diaries, logs, filed inspectors’ logs, calendars, invoices, financial statements, purchase orders, forecasts:
- c. audio tapes, video tapes, computer disks, maps, photographs, moving or still pictures, diagrams, measurements and computer printouts, expressions or statements of policy.

If copies, reproductions or facsimiles of a document are not identical by reason of handwritten notations, initials, identifications marks, post-it notes or other modifications, each such non-identical copy is a separate document within the meaning of this definition and shall be produced.

10. “Related to,” or “regarding” means anything constituting, regarding, reflecting, representing, supporting, pertaining to, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to any matter identified in the Discovery Requests.

11. The term “between” shall be construed to include the word “among” as necessary to bring within the scope of the requests any documents which might otherwise be construed to be outside their scope.

12. The words “identify”, “identity”, and “identification”, when used with respect to a date, subject matter, name(s) or person(s), that date, subject matter, name (s) or person, that

wrote, signed, initialed, dictated or otherwise participated in the creation of the same, the name(s) of the addressee or addressees if any and the name (s) and address(es) of each person(s) who have possession, custody, or control of said document(s). If any such document was, but is no longer in your possession, custody, or control, or in existence, state the date and manner of its disposition.

13. The word "identify" when used with respect to an act (including an alleged offense), occurrence, statement, or document (hereinafter collectively called "act"), means to (1) describe the substance of the event or events constituting such an act, and to state the date when such act occurred; (2) identify each and every person(s) participating in such act; (3) identify all other person(s) (if any) present when such act occurred; (4) state whether any minutes, notes, memoranda, or other record of such act was made; (5) state whether such record now exists; and (6) identify the person(s) presently having possession, custody or control of such record.

DOCUMENT REQUESTS

1. All Documents and Communications within Your possession or control regarding the formation of Unicorn.
2. All Documents and Communications within Your possession or control regarding the ownership of Unicorn.
3. All Documents and Communications within Your possession or control regarding the identity of the members of Unicorn.
4. The Operating Agreement for Unicorn.
5. All Documents and Communications within Your possession or control regarding the business in which Unicorn is engaged.
6. All Documents and Communications within Your possession or control regarding any involvement by Unicorn with the AHCIF.

7. All Documents and Communications within Your possession or control regarding any involvement by Unicorn with low-income housing tax credits.
8. All Documents and Communications within Your possession or control regarding Your roles and responsibilities with Unicorn.
9. All Documents and Communications within Your possession or control regarding Nevels' roles and responsibilities with Unicorn.
10. All Documents and Communications within Your possession or control regarding Estey's roles and responsibilities with Unicorn.
11. All Documents and Communications within Your possession or control regarding the AHCIF.
12. All Communications between You and Nevels regarding Unicorn, Livingston or AHCIP.
13. All Communications between You and Estey regarding Unicorn, Livingston or AHCIP.